

EXHIBIT 1

Halpenny, Ph.D, Genevieve M.

From: Saukshmya Trichi <STrichi@carlsoncaspers.com>
Sent: Wednesday, January 31, 2024 7:00 PM
To: Christopher Johnson; Kraman, Pilar; Kannan, Naresh K.; Cook, John D.; Nash, Douglas J.; Sullivan, Denis J.; Halpenny, Ph.D, Genevieve M.; Robert Vrana
Cc: CommScope_Belden_CCVL; Sara Metzler; Tim A Lindquist; Kelly Farnan; Dennis C Bremer; CommScope_Propel
Subject: RE: Belden Canada, ULC, v. CommScope, Inc., CommScope, Inc of North Carolina, and CommScope Technologies LLC, C.A. No. 22-782-RGA – Discovery Deficiencies

Counsel,

We write to memorialize the parties' meet and confer of January 30, 2024.

CommScope's January 4, 2024 Letter re. Belden's Failure to Answer Interrogatories –

CommScope disagreed with Belden's January 16 email that its interrogatories in the 22-782 and 22-783 matters constitute multiple subparts and contrary to Belden's assertion, CommScope did not reach the 25 interrogatory limit. CommScope also notes that recent case law in Delaware does not support Belden's position. *See Netflix v. Robocast*, Case Nos. 22-cv-305-RGA-JLH, 22-cv-354-RGA-JLH (D. Del. Aug. 29, 2023). The parties are at an impasse on this issue and CommScope will bring this issue to the Court's attention.

CommScope's January 18, 2024 Letter re. Belden's ESI Custodian Disclosures –

Belden confirmed that it will be supplementing its ESI Rule 3 Disclosures in the 22-782 and 22-783 matters by the end of this week. In the 22-783 matter, Belden stated that it will be identifying 10 ESI custodians. In the 22-782 matter, Belden stated that it could not provide an accurate number of custodians at this time but was going to provide a supplementation with up to 10 custodians. CommScope reserves the right to review Belden's supplementation and revisit this issue.

With respect to the 23-810 matter, Belden stated that it was unable to provide an update at this time because it was still considering if it would supplement its ESI Rule 3 disclosures. CommScope reiterated that it has been over two months since the ESI Rule 3 disclosures were due in the case, and should Belden refuse to supplement by the end of week, CommScope will bring this issue to the Court's attention. Belden asked that CommScope identify subject matter that it believed custodians should be designated for. CommScope noted, as also noted in prior correspondence, that it was Belden's obligation to identify ESI custodians who have relevant information in their possession, custody and control. Nevertheless, CommScope pointed to its November 20, 2023 correspondence. Belden then stated that the inventor on the patents-in-suit is no longer a Belden employee, and as such it does not believe that there are any custodians with information concerning conception and reduction to practice, and development of the claimed inventions. CommScope noted that if Belden had possession, custody and control over the non-employee inventor's emails, then Belden should produce this information, even if no custodian is designated. CommScope asked for confirmation on Belden's supplementation by Friday. To the extent Belden refuses to supplement and/or does not provide an update by Friday, it is our understanding that the parties are at an impasse and CommScope will bring this issue to the Court's attention.

Belden's January 17, 2024 Letter –

Belden stated that it was seeking additional discovery on two categories of products, as defined in its interrogatories in the 22-782 matter - "Other Initially Accused Products," and "Additional Products." CommScope enquired about the scope of information being sought by Belden under "Other Initially Accused Products." Belden stated that it was seeking information about products "hav[ing] similar part numbers to the part numbers of the Initially Charted Accused

Products, and are therefore likely to include the infringing compensation structures.” CommScope noted that Belden’s request was overly broad, and unduly burdensome, and fails to articulate relevance of this information. CommScope sought clarification if Belden would consider limiting its ask to non-identified jacks that contained specifically identified PCB part numbers in the relevant time frame. Belden stated it has logically expanded what it is seeking beyond just jacks that contain these PCBs and instead is seeking more broadly any products with “similar features” based on various model number prefixes or other part numbers (beyond PCB part numbers). It also stated that it was not limiting its request to any specific time frame.

With respect to RJ45 jacks as defined by Belden under “Additional Products,” Belden stated that it was seeking information about any and all RJ45 jack products that include compensation structures and/or capacitive coupling elements. It also stated that it was not limiting its request to any specific time frame. CommScope proposed that Belden agree to limit its request to only those RJ45 jack products sold in the pertinent time frame, if any, that have not been identified and had the free-ends of the jack spring tips (those ends not welded or mounted directly to a printed circuit board (PCB) or printed wiring board (PWB)) come into contact with capacitor plates upon insertion of a jack. Belden stated it would consider this.

Please let us know if Belden is willing to narrowing its requests as provided above.

CommScope once again notes that Belden’s open-ended demands in its January 17 letter are overly broad, lack relevance and are unduly burdensome. *Invensas Corp. v. Renesas Elec. Corp.*, 287 F.R.D. 273, 282, 284-85 (D. Del. 2012). CommScope objects to Belden’s fishing expedition into any and all products. Further, Belden is seeking discovery unbounded by time with respect to a patent that expired in 2019. This is improper and causes additional burden to CommScope. Further, this is subject to claim construction, which is currently being briefed by the parties, and therefore Belden’s ask is premature. We also note that CommScope has additional objections to Belden’s interrogatories, and that the parties have met and conferred on a limited issue. CommScope reserves all rights with respect to its responses to Belden’s discovery requests.

Regards,
Saukshmya

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From: Christopher Johnson <CJohnson@carlsoncaspers.com>

Sent: Monday, January 29, 2024 1:01 PM

To: Kraman, Pilar <PKraman@ycst.com>; Kannan, Naresh K. <NKannan@barclaydamon.com>; Cook, John D. <JCook@barclaydamon.com>; Nash, Douglas J. <dnash@barclaydamon.com>; Sullivan, Denis J. <DSullivan@barclaydamon.com>; Halpenny, Ph.D, Genevieve M. <GHalpenny@barclaydamon.com>; Robert Vrana <RVrana@ycst.com>

Cc: CommScope_Belden_CCVL <CommScope_Belden_CCVL@carlsoncaspers.com>; Sara Metzler <Metzler@rlf.com>; Saukshmya Trichi <STrichi@carlsoncaspers.com>; Tim A Lindquist <TLindquist@carlsoncaspers.com>; Kelly Farnan <Farnan@rlf.com>; Dennis C Bremer <DBremer@carlsoncaspers.com>

Subject: RE: Belden Canada, ULC, v. CommScope, Inc., CommScope, Inc of North Carolina, and CommScope Technologies LLC, C.A. No. 22-782-RGA – Discovery Deficiencies

Hi Pilar,

Thank you. 4pm ET tomorrow works for us. Here is information for the call:

Dial in: 888-861-1255

Participant Pin: 558521

Christopher

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From: Kraman, Pilar <PKraman@ycst.com>

Sent: Monday, January 29, 2024 12:17 PM

To: Christopher Johnson <CJohnson@carlsoncaspers.com>; Kannan, Naresh K. <NKannan@barclaydamon.com>; Cook, John D. <JCook@barclaydamon.com>; Nash, Douglas J. <dnash@barclaydamon.com>; Sullivan, Denis J. <DSullivan@barclaydamon.com>; Halpenny, Ph.D, Genevieve M. <GHalpenny@barclaydamon.com>; Robert Vrana <RVrana@ycst.com>

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Christopher,

We are available for a meet and confer on Belden's letter, as well as CommScope's January 4 and 18 letters. We are available tomorrow between 3-5 pm ET and Friday between 11 am -1 pm ET.

Pilar

Pilar G. Kraman, Partner

(Pea-lahr Cray-man)

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From: Christopher Johnson <CJohnson@carlsoncaspers.com>

Sent: Friday, January 26, 2024 3:10 PM

To: Kannan, Naresh K. <NKannan@barclaydamon.com>; Cook, John D. <JCook@barclaydamon.com>; Nash, Douglas J. <dnash@barclaydamon.com>; Sullivan, Denis J. <DSullivan@barclaydamon.com>; Halpenny, Ph.D, Genevieve M. <GHalpenny@barclaydamon.com>; Vrana, Robert <RVrana@ycst.com>; Kraman, Pilar <PKraman@ycst.com>

Cc: CommScope_Belden_CCVL <CommScope_Belden_CCVL@carlsoncaspers.com>; Sara Metzler <Metzler@rlf.com>; Saukshmya Trichi <STrichi@carlsoncaspers.com>; Tim A Lindquist <TLindquist@carlsoncaspers.com>; Kelly Farnan <Farnan@rlf.com>; Dennis C Bremer <DBremer@carlsoncaspers.com>

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Counsel,

We have considered Belden's ask as addressed in your January 17, 2024 correspondence.

We disagree that the scope of discovery Belden is seeking is relevant to the issues in the case and that there is no burden on CommScope. CommScope maintains its objections to Belden's First Set of Interrogatories (Nos. 1-10) and Second Set of Requests for the Production of Documents and Things (Nos. 23-31).

To the extent Belden wishes to meet and confer on this issue, please be prepared to also discuss CommScope's January 4, 2024 letter and January 18, 2024 letter and the issues raised therein. We are available on Monday, January 29, 2024 between 9 and 11 a.m. Central time.

Regards,
Christopher

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From: Saukshmya Trichi <STrichi@carlsoncaspers.com>

Sent: Friday, January 19, 2024 3:53 PM

To: Kannan, Naresh K. <NKannan@barclaydamon.com>; Tim A Lindquist <TLindquist@carlsoncaspers.com>; Kelly Farnan <Farnan@rlf.com>; Dennis C Bremer <DBremer@carlsoncaspers.com>

Cc: Christopher Johnson <CJohnson@carlsoncaspers.com>; CommScope_Belden_CCVL <CommScope_Belden_CCVL@carlsoncaspers.com>; Sara Metzler <Metzler@rlf.com>; Nash, Douglas J. <dnash@barclaydamon.com>; Sullivan, Denis J. <DSullivan@barclaydamon.com>; Halpenny, Ph.D, Genevieve M. <GHalpenny@barclaydamon.com>; Cook, John D. <JCook@barclaydamon.com>; Kraman, Pilar <PKraman@ycst.com>; Robert Vrana <RVrana@ycst.com>

Subject: RE: Belden Canada, ULC, v. CommScope, Inc., CommScope, Inc of North Carolina, and CommScope Technologies LLC, C.A. No. 22-782-RGA – Discovery Deficiencies

Counsel,

We are in receipt of Belden's correspondence of January 17, 2024. We will endeavor to respond soon.

Regards,
Saukshmya

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From: Kannan, Naresh K. <NKannan@barclaydamon.com>

Sent: Wednesday, January 17, 2024 4:16 PM

To: Tim A Lindquist <TLindquist@carlsoncaspers.com>; Saukshmya Trichi <STrichi@carlsoncaspers.com>; Kelly Farnan <Farnan@rlf.com>; Dennis C Bremer <DBremer@carlsoncaspers.com>

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Counsel –

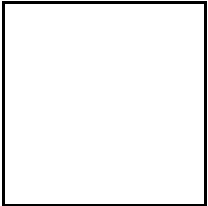
Please see the attached letter.

Best regards,

Naresh

Naresh K. Kannan

Partner



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